NASA Langley Office of Chief Counsel Newsletter

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There has been a great deal of activity at NASA in the last few months. The Shuttle has been retired, and the Administrator announced the new Space Launch System. Langley just completed a great celebration of the Shuttle Program and the many employees and contractors who made contributions to the program over many years. As we celebrated, we bid adieu to the old and press forward with the new. Like the work we do at NASA, the laws and regulations that guide us in our work are filled with the old and the new. Like using some of the old Shuttle Program technology, we still apply what is old law and remain aware of how what is new in the law may change things as we move forward. With respect to old and new law, we've covered a bit of both in this our Fall 2011 Newsletter. What is old is important to remember. What is new is important to learn. I hope this edition of the LaRC OCC Newsletter will help you to remember both the old and learn the new.

Mike Madrid,
LaRC Chief Counsel

OFFICE OF CHIEF COUNSEL STAFF

Michael N. Madrid, Chief Counsel
W. Thomas McMurry, Jr., Deputy Chief Counsel
Pamela M. Link, Legal Secretary
Elaine C. McMahon, Paralegal
Bridgette M. Singleton, Legal Assistant
Gail M. Terry, Legal Assistant

BUSINESS LAW TEAM

Michael I. Mark, Associate Chief Counsel
Shawn T. Gallagher, Attorney Advisor
Patrick H. McCaffery, Attorney Advisor

HUMAN RELATIONS & ETHICS LAW TEAM

Charles A. "Pete" Polen, Associate Chief Counsel
Kenneth H. Goetzke, Jr., Attorney Advisor
Mona C. Williams, Attorney Advisor

INTELLECTUAL PROPERTY LAW TEAM

Robin W. Edwards, Patent Counsel
Thomas K. McBride, Jr., Patent Attorney
Andrea Z. Warmbier, Patent Attorney

MS 30, B2101, R174
5 Langley Blvd., Hampton, VA 23681
757-864-3319

PERSONNEL POINTS

Posted, by law….

Remember bulletin boards? Way back before the information explosion, people would actually post really important information in a central place, so that other people could read it. The U.S. Congress thought it was a wonderful idea, so it passed laws, which require employers to post information on their bulletin boards. Except someone might have recycled your bulletin board, or at least its contents, when you weren't looking. However, the laws requiring "posting" are still on the books (remember books?....).

Have no fear, OCC has prepared a solution for the digital age. For computers inside the Langley firewall, you can access an electronic compilation of posters and information that is required to be posted at a worksite. The link to that site is: http://atlarc2.larc.nasa.gov/wpnotices.html, and it can also be accessed by buttons at the top and bottom of the @LaRC home page. Our office has recently updated the site with recent versions of applicable documents. Employees can read the documents online, or take an "old school" approach by printing the documents and attaching to a suitable surface.

The NASA Shared Services Center, using a slightly different philosophy, also e-mails and posts employee notices; their site is at https://www.nssc.nasa.gov/portal/site/customerservice/menuitem.5eb9b0078fb3f796d0e6df6c4dd72749/ .

More Personnel Points

U.S. Officials Caught Doing The Right Thing By Chinese Bloggers

According to the BBC, relatively normal activities by U.S. Officials have gained the attention of Chinese internet users.

In the article, at http://www.bbc.co.uk/news/world-asia-pacific-14578252 , photos of the new American ambassador to China ordering his own coffee and carrying his own bags struck some viewers as favorably down-to-earth. "Even the head of a Chinese village would travel in more style" a commenter wrote. A similar photo of the Vice President ordering noodles in a family restaurant also drew praise.

In an environment where the actions of Federal employees are constantly scrutinized, it is some comfort that routine actions can sometimes be perceived as examples of highly ethical conduct.

Ethics Edicts

"Don't Even Ask!"
Or, why you must not solicit gifts

One of the regular topics in annual ethics training is the prohibition on Federal employees receiving gifts as a result of their official status as federal employees. Gifts include any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, or other item having monetary value. The reason for this rule is to avoid any actions violating the law and ethical standards of public trust or creating the appearance of private gain.

As covered in the training, there are limited exceptions when a gift may be accepted. For a refresher on these exceptions, see the Office of Government Ethics Website at http://oge.gov/uploadedFiles/Education/Education_Resources_for_Ethics_Officials/Resources/bkbriefwrap_00.pdf, or call the Office of Chief Counsel at 757-864-3221.

But in addition to restrictions on what sorts of gifts may be excepted, there is a specific prohibitions on the solicitation of gifts. Employees shall not, directly or indirectly, solicit a gift or other item of monetary value from a prohibited source; or solicit a gift because of an employee's official position.

There are no exceptions to this rule.

A prohibited source includes any person or entity seeking official action from, doing business with, or conducting activities connected with NASA. This includes, for example, contractors, grantees, partners to agreements, and others who seek to interact with NASA.

Simply put, it is a violation of ethics principles—and likely Federal criminal law—to request, suggest, hint at, or otherwise raise the idea that a gift to you (or anyone else, for that matter) would be appropriate.

For instance, soliciting complimentary or "comped" tickets for a dinner or reception hosted by an outside organization would be improper. This also applies even if the goal is to ensure or increase agency participation. The substance or merit of the activity is not a consideration.

Where improper gift solicitation occurs, any solicited gifts must be returned to the donor or the recipient must pay the fair market value. Disciplinary action against the employee making the solicitation may be warranted. If you have any questions, please seek guidance at the web site listed above, or by contacting our office for advice.

Bonus legal advice: A similar rule exists which also prohibits soliciting gifts on behalf of NASA. The basis for this restriction is in "fiscal" not criminal law or ethics, but the effect is similar. NASA's Space Act and other legislative authority allow it to accept "unsolicited gifts," but Congress and others take a dim view of seeking to run an agency with funds in excess of what Congress appropriated. Our office is available to assist in determining whether offers of assistance may be properly accepted under NASA's various authorities.

Intellectually Speaking

TOP 5 MYTHS OF COPYRIGHT

1. **If it is posted on the internet, it is in the public domain and is free to use.**
   - Myth. While things on the internet may be publicly accessible to copy or download, it does not necessarily mean that the work is in the public domain and free to copy. Moreover, internet users should be cautious before trusting statements from third parties that works are in the public domain. For example, Wikipedia® is a widely used internet source, which claims that some images found on its website are in the public domain. However, each page of Wikipedia® also contains a link to a disclaimer stating that the structure of Wikipedia® allows anyone with an internet connection to alter its content, and that Wikipedia® cannot guarantee the validity of the information found there. Rather than trust the statements of a third party, it is recommended that the user go directly to the source to confirm that the work is in the public domain, or seek written permission for its use if the work is not in the public domain. And, even if the work is in the public domain, it is always advisable to credit the source of the work.

2. **If it doesn't have a copyright notice ©, then it can be copied for free.**
   - Myth. Currently, there is no prerequisite in the United States to utilize a copyright notice on a work in order to receive copyright protection. While the copyright notice may give the copyright holder added benefits (e.g. increased damages if they sue for copyright infringement), the lack of a notice does not prevent a copyright owner from protecting its copyrighted work. Moral of the story - just because you don't see the © notice does not mean that you are in the clear to copy.

3. **Everything NASA does is fair use because we are not commercial users.**
   - Myth. The fact that NASA is not commercially using a work does not automatically mean that the use is "fair use." Whether the use constitutes a commercial use is only one of the four factors to consider in a "fair use" determination. The four factors include: 1) the purpose and character of the use, including whether it is for nonprofit educational or commercial use, 2) the nature of the copyrighted work, 3) the amount and substantiality of the portion used in relation to the whole, and 4) the effect on the potential market or value for the work. So while NASA may have an argument that the first prong weighs in its favor, the first factor is not conclusive, and the other three factors must also be considered.

4. **If I alter the work, it becomes my work so I can do what I want with it.**
   - Myth. One of the exclusive rights that a copyright owner possesses is the right to prepare derivative works, which are works based on or derived from the original work. Therefore, you must get

permission from a copyright owner before proceeding to prepare a derivative work from a third party's work unless the work is publicly available, or unless the use would constitute fair use.

5. **As long as I cite the source, it isn't copyright infringement.**
   - Myth. While acknowledging the source of a work is a good practice with regards to publishing papers, it is not a defense to copyright infringement. So absent a work in the public domain or fair use, written permission should be obtained prior to copying the work.

STI Publication Review - Did you identify New Technology and Third Party Content?

NASA STI documents need to be reviewed and approved through the NF1676L Document Availability Authorization (DAA) process in the Technical Publications Submittal and Approval System (TPSAS) prior to being published or released external to the Agency. This review and approval ensures that NASA STI is properly reviewed, captured, disseminated, and archived by NASA. If you would like more information on the review and approval requirements, you can take a look at NPD 2200.1B, NPR 2200.2C, and LMS-CP-5904.

The TPSAS process includes the identification, review, and approval for any new technology or third party content that is included in an STI document.

New Technology
If new technology is included in your STI document, it is important to identify it!

This identification ensures the Government's patent rights can be preserved. Once a document is made publicly available, any foreign patent rights are lost and a one-year deadline is established for filing a U.S. patent application.

Tips for facilitating a quicker review:

- Identify any invention disclosures (by LAR #) already submitted for the new technology.
- If an invention disclosure has already been submitted and the STI document does not include any modifications, improvements, and/or new embodiments beyond the disclosure(s) already submitted, please note in the comments section of the NF1676L.

Third Party Content
If third party content is included in your STI document, it is important to identify it!

This identification ensures you are properly using a third party's photos, graphics, or other material. (Take a look a TOP 5 MYTHS OF COPYRIGHT for more information on third party content.)

Tip for facilitating a quicker review:

- Identify all of the third party content (page, figure, source and any permissions obtained) within the comments section of the NF1676L.

Conference Publications
For NASA Conference Publications that will include papers and/or presentations provided by third party attendees, it is important that appropriate agreements are executed by such conference attendees prior to submission of their papers/presentations. These agreements will ensure that NASA has permission to publish and that the third party attendee has the responsibility for the content in their paper/presentation. Please contact OCC early to discuss the appropriate agreement. This will make later publication much easier and quicker!

Must-Knows About Reporting a New Technology

- New Technology Disclosures should be submitted using NASA's electronic New Technology Reporting website https://ntr.ndc.nasa.gov/. The system requires you to use Mozilla Firefox as the browser.

- After you submit the disclosure, all of the innovators will receive an email, including the submitter. The email requests that all innovators, including any NASA or non-NASA innovators, approve or deny the submission. ***The disclosure will not route to the next step in the review process until ALL of the innovators, including submitter, approve the disclosure***. The submitter should ensure that all innovators listed have proper email addresses and that everyone knows that such a submission has been made so they can approve (or not) electronically. Please notify the LaRC Office of Chief Counsel (OCC) directly if you have an unavailable or deceased innovator on your New Technology Disclosure; otherwise, the submission will remain in queue waiting for that innovator's approval.

- Once it is received in the OCC, the new technology is assigned a case number in the following format:

  LAR #####-#. A letter will be mailed to NASA employees advising them that the disclosure has been received and referencing the assigned case number.

- If you submitted your new technology disclosure and do not yet have a case number assigned, please do not hesitate to contact Elaine McMahon (x43226) in the OCC to inquire about the status of the disclosure.

Congratulations to Inventors of Recently Issued U.S. Patents

Title	*Issue Date*	*Issued Patent Number*	*Inventors*
Multilayer Electroactive Polymer Composite Material	5/3/2011	7,935,414	Zoubeida Ounaies (VA Commonwealth Univ.)
			Cheol Park (NIA)
			Joycelyn S. Harrison (NASA LaRC)
			Nancy M. Holloway (NASA LaRC)
			Gregory K. Draughon (NASA LaRC)
Jet Engine Exhaust Nozzle Flow Effector	6/14/2011	7,958,733	Travis L. Turner (NASA LaRC)

			Roberto J. Cano (NASA LaRC)
			Richard J. Silcox (NASA LaRC)
			Ralph D. Buehrle (NASA LaRC)
			Christopher M. Cagle (NASA LaRC)
			Randolph H. Cabell (NASA LaRC)
			George C. Hilton (NASA LaRC)
Self-Contained Avionics Sensing And Flight Control System For Small Unmanned Aerial Vehicle	6/14/2011	7,962,252	Qamar A. Shams (NASA LaRC)
			Michael J. Logan (NASA LaRC)
			Estate of Robert L. Fox (NASA LaRC)
			John C. Ingham (Hampton University)
			Sean A. Laughter (NASA LaRC)
			Theodore R. Kuhn (Naval Surface Warfare Center)
			James K. Adams (NASA LaRC)
			Walter C. Babel (Science Application International Corp)
Wholly Aromatic Liquid Crystalline Polyetherimide (LC-PEI) Resins	6/21/2011	7,964,698	Erik S. Weiser (NASA LaRC)
			Theodorus J. Dingemans (National Research Council)
			Terry L. St. Clair (NASA LaRC)
			Jeffrey A. Hinkley (NASA LaRC)
Electrically Conductive, Optically Transparent Polymer/Carbon Nanotube Composite	7/5/2011	7,972,536	John W. Connell (NASA LaRC)
			Joseph G. Smith, Jr. (NASA LaRC)
			Joycelyn S. Harrison (NASA LaRC)
			Cheol Park (National Research Council)
			Kent A. Watson (National Research Council)
			Zoubeida Ounaies (Universities Space Research Association)
Methodology For The Effective Stabilization Of Tin-Oxide-Based Oxidation/Reduction Catalysts	7/26/2011	7,985,709	Jeffrey D. Jordan (NASA LaRC)
			David R. Schryer (NASA LaRC)
			Patricia P. Davis (NASA LaRC)
			Bradley D. Leighty (NASA LaRC)
			A. Neal Watkins (Swales Aerospace)
			Jacqueline L. Schryer (Swales Aerospace)
			Donald M. Oglesby (Swales Aerospace)
			Suresh T. Gulati (Self)
			Jerry C. Summers (Self)
Adaptive Refinement Tools for Tetrahedral Unstructured Grids	8/2/2011	7,991,595	S. Paul Pao (NASA LaRC
			Khaled S. Abdol-Hamid (NASA LaRC)

Method and System for Aligning Fibers During Electrospinning	8/9/2011	7,993,567	Lisa A. Carnell (Duke University)
			Ralph M. Stephens (NASA LaRC)
			Nancy M. Holloway (NASA LaRC)
			Caroline Rhim (Duke University)
			Laura E. Niklason (Duke University)
			Robert L. Clark (Duke University)
			Emilie Siochi (NASA LaRC)
Aqueous Solution Dispersement of Carbon Nanotubes	8/16/2011	7,998,368	Jae-Woo Kim (Science & Technology Corp)
			Cheol Park (NIA)
			Peter T. Lillehei (NASA LaRC)
			Sang H. Choi (NASA LaRC)
			Joycelyn S. Harrison (NASA LaRC)
Multi-Functional Annular Fairing For Coupling Launch Abort Motor To Space Vehicle	8/23/2011	8,002,212	Charles J. Camarda (NASA LaRC)
			Stephen J. Scotti (NASA LaRC)
			Pieter G. Buning (NASA LaRC)
			Stephen X. S. Bauer (NASA LaRC)
			Walter C. Engelund (NASA LaRC)
			David M. Schuster (NASA LaRC)
Micro-Fresnel Zone Plate Optical Devices Using Densely Accumulated Ray Points	9/13/2011	8,018,815	Sang H. Choi (NASA LaRC)
			Yeonjoon Park (Science & Technology Corp)
			Glen C. King (NASA LaRC)
			James R. Elliott (NASA LaRC)
Metal/Fiber Laminate and Fabrication Using A Porous Metal/Fiber Preform	9/13/2011	8,017,190	Stephen J. Hales (NASA LaRC)
			Joel A. Alexa (Lockheed Martin)
			Brian J. Jensen (NASA LaRC)
			Roberto J. Cano (NASA LaRC)
			Erik S. Weiser (NASA LaRC)
Wet Active Chevron Nozzle For Controllable Jet Noise Reduction	9/13/2011	8,015,819	Russell H. Thomas (NASA LaRC)
			Kevin W. Kinzie (NASA LaRC)
High Altitude Airship Configuration And Power Technology And Method For Operation Of Same	9/20/2011	8,020,805	Sang H. Choi (NASA LaRC)
			James R. Elliott (NASA LaRC)
			Glen C. King (NASA LaRC)
			Yeonjoon Park (Science & Technology Corp)
			Jae-Woo Kim (Science & Technology Corp)
			Sang-Hyon Chu (NIAA)

Business Law News

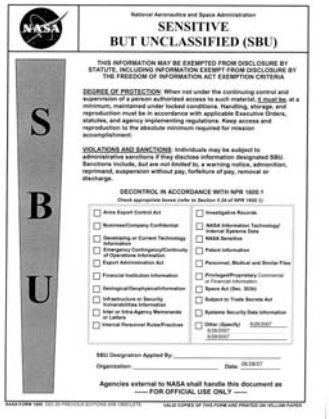
Changes occurring in the world of Space Act Agreements

If you have occasion to enter into a Space Act Agreement (SAA), you may notice changes in the primary tool for creating SAAs which is the Space Act Agreement Maker (affectionately known as SAAM). SAAM generates a draft SAA by providing the user a set of questions, the answers to which determine which clauses are included within the Agreement. A test of the new question set was conducted at Glenn Research Center and Marshall Space Flight Center through August and the new question set has been fielded to the Agency.

The new SAAM question set features a greater use of radio buttons, so all options are immediately visible, removal of some questions that were determined to be unnecessary, an attempt to simplify the question set, and software coding of the interface so that certain questions appear only if prior questions were answered in such a way that makes it necessary to ask the additional questions. Of course the revised question set will generate a draft SAA that incorporates all the appropriate clauses, with blanks completed, utilizing the updated clauses that were adopted with the issuance of NAII 1050.1B, effective June 10, 2011.

The revised clauses reflect modest changes in NASA's approach to intellectual property rights and a greater emphasis on making Umbrella Agreements usable across multiple Centers. The questions reflect a slightly modified approach to assessing liability risks. Please feel free to provide input on what you like and what you do not like to Shawn Gallagher in OCC. Shawn is our point of contact with the NASA team working the SAAM question set and would appreciate any comments on what you see as an improvement or what you believe is not working in SAAM. Shawn may be reached at shawn.t.gallagher@nasa.gov or by calling 43257.

SBU


SENSITIVE
BUT UNCLASSIFIED (SBU)
S
B
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FOR OFFICIAL USE ONLY

What exactly is Sensitive But Unclassified (SBU) Information? To find out, you need to read through Section 5.24 of NASA Interim Directive NM 1600-55 (October 16, 2007). In this Section, you will learn that SBU information is "sensitive information" that does not qualify as classified national security information; however, it is information that NASA has decided must be protected against inappropriate disclosure. Reading further, you will learn that other federal agencies also have this type of designation, although they may use a different term, such as "For Official Use Only" or "Limited Official Use."

This Section also warns readers that even if information is properly designated as SBU according to the requirements of the regulation, it does not mean that this "sensitive information" is exempt from release under the Freedom of Information Act (FOIA). Instead, Section 5.24.2.2(c) correctly states that SBU information requested under FOIA will be reviewed and processed in the same manner as any FOIA request. This statement is important, because this regulation, written in summary outline form, does not fully convey the assorted limitations, exceptions, and nuances regarding disclosure for all types of sensitive information listed. For example, reading this regulation, one might get the impression that

(Continued on next page.)

information subject to export control statutes is exempt from disclosure "by statute." (Section 5.24.2.2(e)(3)(a)) In fact, export-controlled information is usually disclosed, as it can only be withheld under very specific circumstances. Likewise, although information disclosing a new invention (Section 5.24.2.2(e)(3)(c)), or Small Business Innovative Research Data (Section 5.24.2.2(e)(4)(c)), are both eligible for exemption from disclosure under FOIA, in each case, this exemption is for a limited period of time after the information or data is generated.

Because other executive agencies have their own "sensitive information" designation and policy, when we are working with other agencies, we need to have a general understanding of their "sensitive information" marking and the impact and effect of this designation. Can all of these different "sensitive information" policies create confusion? If you think so, then you should be happy to know that President Obama agrees, and on November 4, 2010, the President issued Executive Order 13556 requiring a single set of categories and subcategories to be used throughout the executive branch for unclassified "sensitive information" under the new term "Controlled Unclassified Information" (CUI). Under this order, the National Archives and Records Administration has been charged with leading the effort to develop these CUI categories, and to also develop standard marking, safeguarding, dissemination and decontrol guidance for the entire executive branch. The first implementation guidance was released by the National Archive's newly-formed CUI Office on June 9, 2011. Presently, the CUI Office is gathering proposed ideas on categories and subcategories of CUI from all of the executive agencies. This will eventually lead to a determination on the initial CUI categories.

Until the CUI categories are established and implemented, it is likely that NASA will stick with the current SBU regulation. As a result, we have a couple of common sense points to remember.

1. Always remember that just because a document has the SBU marking does not mean it is exempt from disclosure under FOIA.
2. If information is taken from a document with a restrictive marking (e.g., Proprietary Marking, Limited Rights Notice, ITAR Notice, Source Selection Information Notice) and used in a separate document, the fact that the new document has the SBU marking may not be sufficient to protect this information from release. As a result, it is a good practice to always move the marking with the information.
3. If you are starting a new project, assignment, or you are drafting a document, and you have any concerns or questions about disclosure or protecting information- you can contact OCC and we will help you take the steps necessary When in doubt, contact OCC for assistance, the earlier the better!!!

REIMBURSABLE AGREEMENT SUPPORTING CCDEV AND COTS

As NASA moves from the Shuttle program to supporting commercial ventures to support the ISS and reach low earth orbit, questions have been raised to our office about using reimbursable Space Act Agreements (SAAs) to support recipients of agreements for the Crew Cargo Development (CCDev) and Commercial Orbital Transportation Services (COTS) efforts. These programs use funded SAAs to provide what amounts to venture capital to companies to develop systems to deliver cargo to the ISS (COTS) or to develop vehicles that could transport either cargo or astronauts to the ISS (CCDev). LaRC has several SAAs to provide support to recipients of those agreements on a reimbursable basis, but the rules regarding what costs must be charged to those customers, and what costs may be waived are not as straightforward as we see with other SAAs.

The COTS and CCDev SAAs were entered into as a result of competitions. Recipients receive significant funding under those agreements to pursue designs for vehicles to meet NASA's requirements for ISS support. NASA

Headquarters has indicated that if work LaRC (or other Centers) are to perform for such firms are to support the award of a milestone payment under a funded SAA, then the recipient must pay full cost for any services provided. However, the story does not end there.

There are two statutes that can come into play and they are the Commercial Space Launch Act (CSLA) and the Commercial Space Competitiveness Act (CSCA). While there are differences in the laws the major difference for pricing purposes is that the CSLA requires NASA to collect direct costs of CSLA work while the CSCA states that NASA "may" charge the customer the direct costs of CSCA work. Under NASA Interim Directive (NID) 9090.1, section 4.4.2, the method of pricing direct costs under the CSLA and CSCA is treated identically. NID 4.4.2.1 states: "Direct costs are costs that can be associated unambiguously with a commercial launch effort, and which the Government would not incur if there were no commercial launch effort." While the NID does not prohibit charging Center Management and Operations (CM&O), Agency Management and Operations (AM&O), or service pool costs to commercial entities under the CSLA or CSCA it does state they "should not be included when calculating the direct costs for services or property provided to commercial entities under the CSLA and CSCA" (emphasis in original, see paragraph 4.4.2.3, NID 9090.1). Note, however, that the CSLA requires you to charge only the direct costs of the work, so you should not rely on the language of the NID, which indicates you may be able to charge other than direct costs, when pricing work covered by the CSLA.

It should be noted that the CSLA comes into play only if there is a "commercial launch," i.e., if the FAA has issued a license for the launch. At this point, no such licenses have been issued for the work being performed at LaRC, so the CSLA has not impacted the pricing of our SAAs. Similarly, the CSCA permits NASA to allow non-Governmental entities to use NASA space-related facilities on a reimbursable basis to support commercial space activities. The CSCA applies when we use a space-related facility to carry out the work. NID 9090.1 defines such facilities as follows:

> "those facilities whose use at the time are directly related to gaining access and return from space or the conduct of activities in space. The determination of whether a facility is space-related is based on the nature of the use of the facility and not on its purpose for existing. Some facilities may be dual use, that is, some uses are space-related and some are not."

At LaRC, conceivably a wind tunnel test or use of a vacuum chamber, clean room, or other such facility could fit this definition. To date, OCC is not aware of any such work that triggers the CSCA. Should you think work in support of a COTS or CCDev recipient involves use of a space-related facility, you should contact OCC and OCFO for assistance.

Because no work in support of such recipients to date involves either of these statutes, our SAAs should follow the HQ guidance about recovering full costs if the work is in support of a milestone payment under the funded SAA. HQ also requires that you notify the COTS or CCDev program manager that such work is being proposed, and that the program manager concur with the work being performed under a LaRC SAA.

In summary, if you enter into a reimbursable SAA to support a CCDev or COTS recipient, you must obtain the relevant program manager's concurrence. If the work is to support a CCDev or COTS agreement milestone payment (i.e., the Partner will receive further funding under its funded SAA), we must charge full cost for that work. If it does not support a milestone payment, we can waive costs if the work is collaborative and it benefits LaRC activities to do so. If the work is in support of activities covered by the CLSA or CSCA, we only may charge the direct costs of such work.

The National Institutes of Health have announced that they will no longer be using rats for medical experimentation. In their place, they will use attorneys. They have given three reasons for this decision:

1. There are now more attorneys than there are rats.
2. The medical researchers don't become as emotionally attached to the attorneys as they did to the rats.
3. No matter how hard you try, there are some things that even rats won't do.

KLIPSTEIN's LAWS OF GENERAL ENGINEERING:

1. A patent application will be preceded by a similar application submitted one week earlier by an independent worker.
2. Firmness of delivery dates is inversely proportional to the tightness of the schedule.
3. Dimensions always will be expressed in the least usable term. Velocity, for example, will be expressed in furlongs per fortnight.
4. Any wire cut to length will be too short.

UNIVERSAL LAWS FOR NAÏVE ENGINEERS (a selected few from a larger list):

1. In any formula, constants (especially those obtained from engineering handbooks) are to be treated as variables.
2. Interchangeable parts won't.
3. If more than one person is responsible for a miscalculation, no one will be at fault.
4. Warranty and guarantee clauses are voided by payment of the invoice.

FOUR LAWS OF ACCOUNTING:

1. Trial balances don't.
2. Working capital doesn't.
3. Liquidity tends to run out.
4. Return on investments never will.